

App. No. 09/997,057  
Amendment Dated: November 2, 2005  
Reply to Final Office Action of September 16, 2005

### REMARKS/ARGUMENTS

Claims 1-20 remain in this application for further review. Claims 1-20 are rejected under 35 U.S.C. §102(a) as being anticipated by Brett McLaughlin "Java & XML" 2nd edition, Pub. by O'Reilly & Associates, Sebastopol CA, 2000 and 2001 (hereinafter "McLaughlin"). The claims have been amended to clarify the language of the claims. Applicant asserts that McLaughlin teaches a different invention than the elements recited in the claims. Applicant believes that the claims are allowable under 35 U.S.C. §102(a).

#### **I. Elements of the Claims Not Taught by McLaughlin**

Along with other language in the claim, independent claim 1 specifically recites the following language that is not taught or otherwise suggested by McLaughlin:

"a first definition data field defining the first data structure as a first namespace, the first definition data field including a *locally modifiable* common name portion and a *global* unique identifier portion, wherein the common name portion is *locally* associated with the first namespace and the unique identifier portion is *globally* associated with the first namespace, the common name portion being configured to *locally* identify the first namespace in a human-readable manner, the unique identifier portion being configured to *globally* distinguish the first namespace from other namespaces to allow the first namespace to be imported into other namespaces without a conflict *associated with the common name portion*." Emphasis added.

The specification of the present invention provides at least one example of the functionality of the present invention. The citation below is not included herein to limit the claims of the invention in any manner. The citation below is included to give one example in hopes of exemplifying the unique combination of elements recited in claim 1. The specification specifically recites as follows:

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The present invention provides a technique for naming namespaces that allows one namespace to be made available to another namespace without creating name collisions within the other namespace during the build process and at run-time *while still allowing readable names to be used within each namespace*. Generally stated, a namespace is defined by *a readable name in conjunction with a unique namespace identifier*, such as a Globally Unique Identifier (GUID). These defined namespaces may then be imported into other namespaces and *locally renamed to any readable name, such as to an alias*. Using the alias, locally written names can be kept as short as desired or otherwise written in any user-friendly fashion. *However, since the imported namespace is also associated with a unique identifier, objects within the imported namespace may be referred to by common names without causing name collisions within the importing namespace*. The namespace mechanism of the present invention allows exporting all or a portion of an imported namespace. This import/export mechanism enables the creation of namespace hierarchies. The namespace mechanism supports creation of arbitrary parallel namespace hierarchies that reflect multiple taxonomies. Importantly, the namespace mechanism uniquely identifies each namespace with an identifier, but allows referencing the namespace with a readable name. *Specification, at pg. 2, lines 10-27 (emphasis added).*

As another example of elements of the above, two namespaces may each have the name "Accounts" and a conflict will not arise. As set forth above, each namespace with the name "Accounts" will also be identified by a globally unique identifier. In this manner, namespaces with the same namespace may be referenced, imported and moved without conflict. As another example, a namespace with the name "Accounts" may be imported into an "XYZ Business" namespace. After import, it may be decided that the name of the namespace "Accounts" should be changed to "Best Accounts." In so far as a globally unique identifier exists, the common name may be changed and still refer to the same data.

McLaughlin does not teach or otherwise suggest the elements set forth in claim 1. McLaughlin teaches that "[t]he namespace specification requires that a unique URI be associated with *a prefix to distinguish the elements in the namespace from elements in other*

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*namespaces.*" *McLaughlin*, at pg. 19 (emphasis added). The present invention specifically recites the problems with prefixes and namespaces. The specification recites as follows:

One approach for having unique names is by prefixing the name of the artifact (class, type, interface, etc.) with a company name, a product name or the like. This approach, however, results in very lengthy and cumbersome names. These lengthy and cumbersome names make it more difficult to write code. In addition, when trademarks or domain names are used, the prefixes do not provide a stable reference over a long period of time because the trademark or domain name may expire, may be sold or may otherwise undergo a change of ownership. *Specification*, at pg. 1, lines 21-27.

Accordingly, *McLaughlin* teaches directly away from the elements of the claims of the present invention. Moreover, applicant can find no teaching of a "a locally modifiable common name portion" and/or a "global unique identifier portion." There is no teaching in *McLaughlin* of a "unique identifier portion being configured to globally distinguish the first namespace from other namespaces to allow the first namespace to be imported into other namespaces without a conflict associated with the common name portion." Accordingly, applicant believes that claim 1 is allowable over the cited reference.

Along with other language in the claim, independent claim 8 specifically recites the following language that is not taught or otherwise suggested by *McLaughlin*:

"a first namespace having a *localized common name* and a *globally unique identifier*, the first namespace including a plurality of declarations" Emphasis added.

"a second namespace having an import declaration that causes the first namespace to be included within the scope of the second namespace, the import declaration defining a local name that identifies the first namespace by *the localized common name and the globally unique identifier such that a declaration within the plurality of declarations in the first namespace is accessible in the scope of the second namespace by reference to the local name for the first namespace*" Emphasis added.

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Along with other language in the claim, independent claim 13 specifically recites the following language that is not taught or otherwise suggested by Forbes:

"a first namespace having a *first common name* and a *globally unique identifier*, the first namespace including a plurality of declarations" Emphasis added.

"a second namespace having an import declaration that causes the first namespace to be included within the scope of the second namespace, the import declaration *defining a second common name that identifies the first namespace by the first common name and the globally unique identifier* such that a declaration within the plurality of declarations in the first namespace is accessible in the scope of the second namespace *by reference to the second common name for the first namespace*" Emphasis added.

Along with other language in the claim, independent claim 18 specifically recites the following language that is not taught or otherwise suggested by McLaughlin:

"declaring a first namespace with a *globally unique namespace identifier*, the first namespace including a *first localized common name* and a plurality of declarations" Emphasis added.

"importing the first namespace into a second namespace using the globally unique namespace identifier *and a second localized common name*" Emphasis added.

accessing a declaration within the plurality of declarations in the first namespace within the scope of the second namespace *by reference to the second localized common name*" Emphasis added.

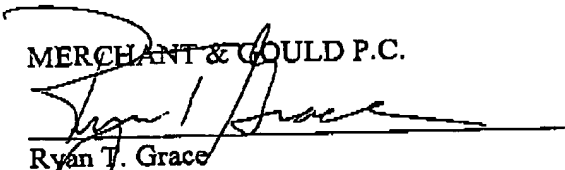
In support for independent claims 8, 13 and 18 applicant relies on the arguments set forth above in support for claim 1 and the contentions set forth above explaining the teachings of McLaughlin. Regarding claims 2-7, 9-12, 14-17 and 19-20, applicant asserts that the elements of those claims are not taught by the cited reference (see contentions above in support for claim 1). Furthermore, claims 2-7, 9-12, 14-17 and 19-20 ultimately depend from claims 1, 8, 13 and 18, respectively. Applicant asserts that claims 2-7, 9-12, 14-17 and 19-20 are allowable for at least the same reasons set forth above.

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In view of the foregoing amendments and remarks, all pending claims are believed to be allowable and the application is in condition for allowance. Therefore, a Notice of Allowance is respectfully requested. Should the Examiner have any further issues regarding this application, the Examiner is requested to contact the undersigned attorney for the applicant at the telephone number provided below.

Respectfully submitted,

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